

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)

)

ET Docket No. 13-81 (TV White Spaces))

May 6, 2013

SPECTRUM BRIDGE INC & Meld Technology.

Reply to Comments on Waiver Request

Spectrum Bridge and Meld Technology respectfully makes the following response to the public comment period of the Waiver Request. Both companies would be happy to provide additional information to help the FCC in completing the process. We ask that, based on the lack of identification of any real issues and the support of organizations like NAB that the FCC grant this waiver and permit the companies to refocus on solving the longer term issue of indoor geo-location. Both companies continue to fully support and be held responsible for upholding the FCC rules for the operation of TV White Space devices.

/S/ Peter Stanforth
CTO
Spectrum Bridge Inc.

/S/ Jordan DuVal
President and CEO
Meld Technology

Detail analysis of the comments.

Many of the comments that opposed the waiver request identified issues that were not related to the waiver request, beyond the scope of the waiver request, or possibly relevant to TV white space so these have been ignored. On balance we respectfully submit that none of the objections was substantial and non identified that the waiver created new or unreasonable burden or potential interference.

EIBASS questioned why the waiver was filed by Spectrum Bridge and argued that Meld Technology was in some way abdicating responsibility. In fact the waiver was filed by Spectrum Bridge because the waiver does not require, or ask for, any change to the current specification or certification of the Meld Radio. The waiver asks for a change to the way the database responds with channel lists based on the definition of the Meld device. However in an abundance of caution, and to alleviate any doubt this response, which categorically states that **Spectrum Bridge and Meld Technology will comply with all FCC rules and requirements for TV White Space devices** is co-signed by both companies.

EIBASS asked about devices potential to interfere with broadcast TV reception, implying that the waiver increased the likelihood of such interference. In fact the waiver specifically states that the Meld Technology device is a 40mw device that will be treated like a 40mw personal/portable device. As such it will have no more impact on TV reception than a 40mw device and, despite the waiver, the database will not provide the Meld Technology device with permission to use channels above and beyond what the FCC has deemed permissible by 40mw personal/portable devices at the same location.

EIBASS asked what happens at the end of the waiver period. It was unclear what they were expecting but the clear intent is that the devices shipped under the waiver will continue to be managed by the database as defined in the waiver. This includes the possibility to amend the channel availability criteria for these devices by specific device identity, or location.